



April 11, 2007

Dan Pitman
Air Quality Permitting
Division of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

Dear Mr. Pitman,

In response to your April 4, 2007 e-mail, the Thompson Creek Mining Company (TCMC) is submitting the following information for your consideration. Attached are spread sheets with the revised information and emissions inventory.

Response to Item #1 in IDEQ E-mail

TCMC wishes to clarify that, both the East and West Ore Feeders are controlled with wet venturi scrubbers as stated on page 2 of 26, Appendix C of the Air Quality Operating Permit Renewal Application, Tier II. These sources are not controlled by a baghouse as stated on pages 11 of 26 and 12 of 26. The reference to the baghouse control for the Ore Feeders was an oversight in the application. I apologize for any confusion the baghouse reference created.

In regard to the control efficiency for the Ore Feeder venturi scrubbers, TCMC has revised the prior 99% control efficiency to the AP 42 recommended 95% (AP 42 Volume 1, Fifth Edition, Section 11.24.3, Page 11.24-6) per your request.

The table below shows how the revised control efficiency affects the annual and hourly emission rates while retaining the same emission factors relied on in the Tier II application.

Table 1 Ore Feeder Emissions			
Emission Factor	Emission Rate (tons/yr)	Control Efficiency	Emission Rate (lbs/hr)
PM			
0.12 lbs/ton	8.76	99%	2.00
0.12 lbs/ton	43.8	95%	10.00
PM10			
0.06 lbs/ton	4.38	99%	1.00
0.06 lbs/ton	21.9	95%	5.00

The attached spread sheets reflect these changes.

THOMPSON CREEK MINING COMPANY
PO BOX 62
CLAYTON, ID 83227

Response to Item #2 in IDEQ E-mail

An error was made in the units for the Boiler #1 and Hot Oil Boiler PM-10 emission factors in the permit application for the pound per hour calculation. TCMC has changed the emission factor as requested to 2.3 lbs/10³ gallons for PM-10. The table below shows the emission rates using this emission factors.

Table 2 Boiler Emission Rates

Source	Emission Factor	Emission Rate (tons/yr)	Emission Rate (lbs/hr)
Boiler #1	2.3 lbs/10 ³ gal	0.33	0.076
Hot Oil Boiler	2.3 lbs/10 ³ gal	0.1360	0.031

The attached spread sheets reflect these changes.

Response to Item #3 in IDEQ E-mail

The Waste Oil heaters in question are used to heat the maintenance shops (i.e., they are space heaters). The Waste Oil heaters were not modeled, nor were emissions estimates provided in the Tier II application as TCMC considers the space heaters to be exempt from Permit to Construct requirements under IDAPA 58.01.01.222.02.h (used Oil Fired Space Heaters) and, therefore, exempt from the Tier II Permit coverage (as was the case under the past Tier II permit). The total emissions for the space heaters were, however, calculated (in the tons per year) to determine whether the facility is a Title V (Tier I) major facility (which it is not). At your request TCMC estimated the emissions from the space heaters using the following emission factor:

PM10 31.15 lb/10³ gallons AP 42 Volume 1, Fifth Edition, Section 1.11, Table 1.11-1
Ash content at 0.65%

The table below shows the estimated annual and hourly emission rates using this emission factor. The emission rates are extremely low.

Table 3 Waste Oil Heater Emission Rates (PM-10)

Source Waste Oil Heaters	Emission Factor	Emission Rate (tons/yr)	Emission Rate (lbs/hr)
Truck Shop 1	31.15 lbs/10 ³ gal	0.039	0.11
Truck Shop 2	31.15 lbs/10 ³ gal	0.039	0.11
Wash Bay 1	31.15 lbs/10 ³ gal	0.039	0.11
Wash Bay 2	31.15 lbs/10 ³ gal	0.039	0.11

The stack information you requested is located in the attached spread sheets. TCMC continues to believe that the space heaters should be exempt from Tier II Permit coverage (each heater runs 2,800 hours per year maximum and combined add less than 0.7 tons per year and 0.5 pounds per hour of PM-10 to the facility

April 11, 2007

totals). Let us know at your earliest convenience if you disagree. The attached spread sheets nonetheless accounts for the emissions from the space heaters in the total emissions.

Response to #4

TCMC will accept IDEQ modeling of the updated emissions inventory. TCMC would offer to conduct the modeling to help expedite the completion of this application process. Please contact me at your earliest convenience should IDEQ want to proceed with TCMC conducting the modeling.

Sincerely,

A handwritten signature in cursive script that reads "Eric R. Tilman".

Eric Tilman
Environmental Engineer,
Thompson Creek Mine

SECTION 1: GENERAL INFORMATION

COMPANY NAME Thompson Creek Mining Company

STREET ADDRESS OR P.O. BOX P.O. Box 62

CITY Clayton

STATE Idaho

ZIP 83227

PERSON TO CONTACT Bert Doughty

TITLE Environmental Manger

PHONE NUMBER 208-838-2200

EXACT PLANT LOCATION 2.5 Miles north of Highway 75 between Thompson Creek and Squaw Creeek

GENERAL NATURE OF BUSINESS Molybdenum mining

NUMBER OF FULL-TIME EMPLOYEES 220

PROPERTY AREA (ACRES) 1900

REASON FOR APPLICATION = (6)

- (1) Permit to Construct a new facility;
- (2) Permit to Modify an existing source;
- (3) Permit to Construct a new source at an existing facility;
- (4) Change of Owner or Location;
- (5) Tier I Permit to Operate;
- (6) Tier II Permit to Operate

DISTANCE TO NEAREST
STATE BORDER (MILES) 68

SIC 1066

PLANT LOCATION COUNTY Custer

ELEVATION (FT) ~ 7500

UTM ZONE 11

UTM (X) COORDINATE (KM) 694

UTM (Y) COORDINATE (KM) 4912

NAME OF FACILITIES

LOCATION OF OTHER FACILITIES

The following facilities are under the control of Thompson Creek Mining Co. and have permittable emissions to the air.

Thompson Creek Mine

OWNER OR RESPONSIBLE OFFICIAL Kent Watson

TITLE OF RESPONSIBLE OFFICIAL Vice President

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete.

SIGNATURE OF RESPONSIBLE OFFICIAL

DATE

**THOMPSON CREEK MINE
SOURCE GENERAL INFORMATION**

SECTION 2: FUEL BURNING EQUIPMENT											
SOURCE	DESCRIPTION	DATE INSTALLED	DATE LAST MODIFIED	MANUFACTURER	MAKE/MODEL	USED FOR PROCESS %	USED FOR SPACE HEAT %	FUEL TYPE	FUEL CODE	HEAT CONTENT Btu/gal	
Waste Oil Heaters						0	100		O2	137000	
Boilers											
Boiler #1	steam boiler	1981		York Shippy		100	0	fuel oil	O2	137000	
Hot Oil Boiler	Hot oil boiler	1981		Parker		100	0	fuel oil	O2	137000	
LPG Heating							100				
GENERATORS											
Motivator	emergency power generator	1981		Cummins		100	0	fuel oil	O2	137000	
Mill Auxiliary	emergency power generator	1981		Caterpillar	SR4 ARR:5N5060	100	0	fuel oil	O2	137000	
Pumpback	emergency power generator	1981		Caterpillar	SR4 ARR:1W0739	100	0	fuel oil	O2	137000	
Tailings Pumps	emergency power generator	1996		Waukesha	VHP L5792	100	0	fuel oil	O2	137000	
SECTION 3: PROCESS AND MANUFACTURING OPERATIONS											
POLLUTION CONTROL EQUIPMENT											
SOURCE	DESCRIPTION	DATE INSTALLED	DATE LAST MODIFIED	MANUFACTURER	MAKE/MODEL	DESCRIPTION	QUANTITY	TYPE	CODE	MANUFACTURER	MAKE/MODEL
Primary Crusher	Gyratory Crusher	1981		GATX-Fuller		Baghouse	1	baghouse	O18	American Air Filter	jet pulse modular Fabrikpak
Overland Conveyor Drive 1	conveyor transfer point	1981		GATX-Fuller		Baghouse	1	baghouse	O18	American Air Filter	jet pulse modular Fabrikpak
East and West Ore Feeders	apron feeders	1981				Wet Scrubber	2	Venturi	O53	Ducon	multivane, Model IV
Holoflite Dryer #1	Holoflite Dryer	1981		Holo Flite	D-1216-5	Wet Scrubber	1	Venturi	O53	Luftrol	KVS10
		1989				Smog Hog	1	ESP	O10	United Air Specialists	SH-10
Leach Plant	Leach fume collection	1981				Caustic Scrubber	1	Packed	O70	Ceilicote	SPT-82
Lube Grade Dryer Stack		1989				Smog Hog	1	ESP	O10	United Air Specialists	SH-10
Holoflite Dryer #2	Holoflite Dryer	1989		Joy-Denver	D-1216-5	Wet Scrubber	1	Venturi	O53	Luftrol	KVS10
Rotary Kiln	Rotary kiln dryer	1989		Christian	12-13-16-UNI	Wet Scrubber	1	Venturi	O54	Luftrol	KVS11
Jet Mill/Jet Mill Baghouse	pneumatic mill	1989		Pulvajet Mill	Aljet Model 810 CIHL	Baghouse	1	baghouse	O18	Mikro Pulsaire	36-S-10-30
Tech Fine Packaging Bin	packaging	1989				Baghouse	1	baghouse	O18	Mag-Pac	52-65
Pancake Mill Feed Bin	feed bin	1992				Baghouse	1	baghouse	O18	American Air Filter	AR35
Pancake Mill	pneumatic mill	1992		Jet Pulverizer	Micron-Master						
Super Fine Packaging Bin	packaging	1992				Baghouse	1	baghouse	O18	Mag-Pac	52-65
Pebble Lime Baghouse	pneumatic transport system	1981				Baghouse	1	baghouse	O18	Dalamate	
Portable Crusher	gravel crusher	1981		Pioneer	2036	Water Sprays		water spray	O61		
SECTION 5: STORAGE AND HANDLING OF LIQUID SOLVENTS & OTHER VOLATILE COMPOUNDS											
DESCRIPTION	TANK TYPE	CONTENTS	TANK CAPACITY (gal)	VENT TYPE	LOCATION						
Diesel fuel storge, fueling	Horizontal cylinder, fixed roof	diesel fuel	20,000	open, turned down	7250 Hot Start						
Diesel fuel storge, fueling	Horizontal cylinder, fixed roof	diesel fuel	10,000	open, turned down	7900 Hot Start						
Diesel fuel storge, fueling	Horizontal cylinder, fixed roof	diesel fuel	10,000	open, turned down	east end Mill						
Diesel fuel storge, fueling	Horizontal cylinder, fixed roof	diesel fuel	1,000	open, turned down	south of Mill Lab						
Diesel fuel storge, fueling	Horizontal cylinder, fixed roof	diesel fuel	10,000	open, turned down	Upper Mill						
Diesel fuel storge, fueling	Horizontal cylinder, fixed roof	diesel fuel	500	open, turned down	south of Fab Shop						
Diesel fuel storge, fueling	Horizontal cylinder, fixed roof	diesel fuel	500	open, turned down	Kelly Building						
gasoline storage, fueling	Horizontal cylinder, fixed roof	gasoline	10,000	open, turned down	Kelly Building						

THOMPSON CREEK MINE STACK INFORMATION

STACK/SOURCE	HEIGHT (ft)	I.D. (in)	EXIT TEMP (F)	FLOWRATE (acfm)	DIRECTION	COVERED
PROCESS AND MANUFACTURING OPERATIONS						
Primary Crusher Stack	65.58	27.96	ambient	18000	vertical	no
Overland Conveyor Stack	10	18	ambient	5000	horizontal	no
East Ore Feeders Stack	85.33	18.5	ambient	58.2	vertical	no
West Ore Feeders Stack	85.33	18.5	ambient	58.4	vertical	no
Holoflite Dryer #1 Stack	81	11.75	ambient	501.4	vertical	no
Leach Fume Scrubber Stack	90.25	16	ambient	5341	vertical	no
Lube Grade Dryer Stack	90.25	8	ambient	347	vertical	no
Jet Mill Baghouse Stack	37.5	19.5	ambient	1728	vertical	yes
Tech Fine Packaging Baghouse Stack	38	6	ambient	146	horizontal	no
Pancake Mill Feed Bin Baghouse Stack	14.75	8.25	ambient	444.9	horizontal	no
Super Fine Packaging Bin Baghouse Stack	25	6	ambient	593.7	horizontal	no
Pebble Lime Baghouse	68.88	12	ambient	2000	vertical	yes
FUEL BURNING EQUIPMENT						
Waste Oil Heaters						
Truck Shop 1	25	8	270	850	horizontal	no
Truck Shop 2	25	8	270	850	horizontal	no
Wash Bay 1	25	8	270	850	horizontal	no
Wash Bay 2	25	8	270	850	horizontal	no
Boiler #1	84	12	500	408	vertical	no
Hot Oil Boiler	84	12	500	936	vertical	no
GENERATORS						
Motivator	15	4	900	2325	vertical	no
Mill Auxiliary	20	6	1200	1570	vertical	yes
Pumpback	12	6	900	2430	vertical	no
Tailings Pumps	15	10	900	1985	horizontal	no

**THOMPSON CREEK MINE
PCE DATA**

SCRUBBER/SOURCE	PRESSURE DROP (" H2O)	LOW	HIGH	WATER FLOW RATE (gpm)	LOW	HIGH
East Ore Feeders Reclaim Dust Scrubber		6	16		14	17
West Ore Feeders Reclaim Dust Scrubber		6	16		14	17
Holoflite Dryer #1 Venturi Scrubber		0.13	0.23		6	12
Leach Fume Caustic Scrubber		2	10		N/A	58
Holoflite Dryer #2 Venturi Scrubber		0.13	0.23		6	12
Rotary Kiln Venturi Scrubber		0.12	0.22		7	13
BAGHOUSE/SOURCE	PRESSURE DROP (" H2O)	LOW	HIGH	AIR-TO- CLOTH RATIO		
Primary Crusher Baghouse		3	7	10:01		
Overland Conveyor Baghouse		3	7	7:01		
Jet Mill Baghouse		0.7	1	10:01		
Tech Fine Packaging Bin Baghouse		1	1.5	2:01		
Pancake Mill Feed Bin Baghouse		0.2	8	5:01		
Super Fine Packaging Bin Baghouse		1.3	6	1:01		
Pebble Lime Baghouse		3	5	9:01		
ESP						
Holoflite Dryer #1 Smog Hog	Triple Pass					
Lube Grade Dryer Stack Smog Hog	Triple Pass					

THOMPSON CREEK MINE PROCESSING DATA

SECTION 2: FUEL BURNING EQUIPMENT									
Waste Oil Heaters	10,000	2,800	3.6	A =	0.65				
	gal/year	hr/yr	gal/hr	S =	0.5				
Boilers									
Boiler #1	289,080	33	8760	S =	0.5				
Hot Oil Boiler	118,260	13.5	8760						
	gal/year	gal/hr	hr/yr						
LPG Heating	25,000			S =	0.16	gr/1000 ft3			
	gal/year								
ELECTRIC POWER GENERATORS									
Motivator	3,000	1490		S =	0.5				
Mill Auxiliary	500	265							
Pumpback	500	450							
Tailings Pumps	500	1272							
	hr/yr	hp							
MOBIL EQUIPMENT COMBUSTION									
Haul Trucks	66,000	780,000		S =	0.5				
Dozers	9,000								
Wheeled Loaders	9,000								
Motor Graders	9,000	16,400							
Wheeled Dozers	9,000								
Misc.	2,000								
	hours/year	VMT							
SECTION 3: PROCESS AND MANUFACTURING OPERATIONS									
Primary Crusher	16,242,500	3650	4450						
	tons/year	hr/yr	ton/hr						
Overland Conveyor	16,242,500	3650	4450						
	tons/year	hr/yr	ton/hr						
East and West Ore Feeders	14,600,000	8760	24	40,000	1,667	3,333,333			
	tons/year	hr/yr	hr/day	tons/day	ton/hr	lb/hr			

THOMPSON CREEK MINE PROCESSING DATA

Holoflite Dryer #1	81,030	8760	9.25						
	tons/year	hr/yr	ton/hr						
Leach Plant	2,783	8760							
	tons/year	hr/yr							
LUBE GRADE HPM PRODUCTION									
Holoflite Dryer #2	1,253	24	365	8760	5488.14	Vented through a common stack			
Rotary Kiln	1,253	24	365	8760	5488.14	One source			
	lb/hr	hr/day	day/yr	hr/yr	ton/yr				
Jet Mill/Jet Mill Baghouse	1,600	24	300	7200	5760	feed from the JM feed bin, discharge to JM BH			
Tech Fine Packaging Bin	1,600	24	300	7200	5760	feed from JM baghouse			
	lb/hr	hr/day	day/yr	hr/yr	ton/yr				
Pancake Mill Feed Bin	1,450	3412	850	feed coming from the jet mill to the pancake mill feed bin					
Super Fine Packaging Bin	1,450	8760	331	feed coming from the pancake mill to the super fine storage bin					
	tons/year	hr/yr	lb/hr						
Pebble Lime Baghouse	5,000	416.667	12						
	tons/year	hr/yr	ton/hr						
Portable Crusher	700,000	3500	200						
	tons/year	hr/yr	ton/hr						
SECTION 5: STORAGE AND HANDLING OF LIQUID SOLVENTS & OTHER VOLATILE COMPOUNDS									
Gasoline									
Filling - submerged	75,000								
Breaking	75,000								
Fueling	75,000								
Spillage	75,000								
	gal/year								
Diesel									
Loading - submerged	693,000								
	gal/year								

THOMPSON CREEK MINE EMISSION FACTORS

SOURCE	EMISSION FACTOR TSP OR OTHER	EMISSION FACTOR PM10	FACTOR REFERENCE
PROCESS AND MANUFACTURING OPERATIONS			
Primary Crusher	0.5 lb/ton	0.05 lb/ton	AP 42 Volume 1, Fifth Edition, Table 11.24.2
Overland Conveyor	0.12 lb/ton	0.06 lb/ton	AP 42 Volume 1, Fifth Edition, Section 11.24.2, Table 11.24-2
East and West Ore Feeders	0.12 lb/ton	0.06 lb/ton	AP 42 Volume 1, Fifth Edition, Section 11.24.2, Table 11.24-2
Holoflite Dryer #1	4.93 lb/ton	1.97 lb/ton	Request for Permit Modification, Thompson Creek Mining Company, March 1996 (Brown and Caldwell), Section D, Emissions Estimates.
Leach Plant	0.003 lb/hr		HCI Emission Rate, Stack Sampling, AMTEST AIR QUALITY, LLC, October 28, 1998
Lube Grade Dryer Stack	0.001	0.001	Stack Sampling, AMTEST AIR QUALITY, LLC, February 28, 2000.
Holoflite Dryer #2/Rotary Kill	lb/hr		
Rotary Kiln			
Jet Mill Baghouse	0.016	0.016	Stack Sampling, AMTEST AIR QUALITY, LLC, October 27-28, 1998.
Tech Fine Packaging Bin BH	0.013 lb/hr	0.013 lb/hr	Stack Sampling, AMTEST AIR QUALITY, LLC, October 27-28, 1998.
Pancake Mill Feed Bin BH	0.001	0.001	Stack Sampling, AMTEST AIR QUALITY, LLC, May 25, 1999.
Super Fine Packaging Bin BH	0.024 lb/hr	0.024 lb/hr	Stack Sampling, AMTEST AIR QUALITY, LLC, May 26, 1999.

THOMPSON CREEK MINE EMISSION FACTORS

Pebble Lime Baghouse	2.2	0.88	Request for Permit Modification, Thompson Creek Mining Company, March 1996 (Brown and Caldwell), Section D, Emissions Estimates.
	lb/ton	lb/ton	
FUEL BURNING EQUIPMENT			
Waste Oil Heaters	41.6	31.15	Ap-42, Fifth Edition, Table 1.11-1.
	lb/1000 gal	lb/1000 gal	A = 0.65 (ash at 0.65%)
Boilers			
Boiler #1	0	2.3	Ap-42, Fifth Edition, Table 1.3-2.
Hot Oil Boiler	0	2.3	Ap-42, Fifth Edition, Table 1.3-2.
	lb/1000 gal	lbs/1000 gals	
LPG Heating	0	0.1	Ap-42, Fifth Edition, Table 1.5-1.
	lb/1000 gal	lb/1000 gal	
FUEL BURNING EQUIPMENT	NOx		
Waste Oil Heaters	55		Ap-42, Fifth Edition, Table 1.3-2.
	lb/1000 gal		
Boilers			
Boiler #1	20		Ap-42, Fifth Edition, Table 1.3-2.
Hot Oil Boiler	20		Ap-42, Fifth Edition, Table 1.3-2.
	lb/1000 gal		
LPG Heating	8.8		Ap-42, Fifth Edition, Table 1.5-1.
	lb/1000 gal		
FUEL BURNING EQUIPMENT	SOx		
Waste Oil Heaters	73		Ap-42, Fifth Edition, Table 1.3-2.
	lb/1000 gal		
Boilers			
Boiler #1	71		Ap-42, Fifth Edition, Table 1.3-2.
Hot Oil Boiler	71		Ap-42, Fifth Edition, Table 1.3-2.
	lb/1000 gal		

THOMPSON CREEK MINE EMISSION FACTORS

LPG Heating	0.014		Ap-42, Fifth Edition, Table 1.5-1.
	lb/1000 gal		
FUEL BURNING EQUIPMENT	CO		
Waste Oil Heaters	5		Ap-42, Fifth Edition, Table 1.3-2.
	lb/1000 gal		
Boilers			
Boiler #1	5		Ap-42, Fifth Edition, Table 1.3-2.
Hot Oil Boiler	5		Ap-42, Fifth Edition, Table 1.3-2.
	lb/1000 gal		
LPG Heating	1.8		Ap-42, Fifth Edition, Table 1.5-1.
	lb/1000 gal		
ELECTRIC POWER GENERATORS			
Motivator	0	0.0022	AP-42, Fifth Edition, Table 3.3-1
Mill Auxiliary	0	0.0022	AP-42, Fifth Edition, Table 3.3-1
Pumpback	0	0.0022	AP-42, Fifth Edition, Table 3.3-1
Tailings Pumps	0	0.0022	AP-42, Fifth Edition, Table 3.3-1
	lb/hp-hr	lb/hp-hr	
ELECTRIC POWER GENERATORS	NOx		
Motivator	0.031		AP-42, Fifth Edition, Table 3.3-1
Mill Auxiliary	0.031		AP-42, Fifth Edition, Table 3.3-1
Pumpback	0.031		AP-42, Fifth Edition, Table 3.3-1
Tailings Pumps	0.031		AP-42, Fifth Edition, Table 3.3-1
	lb/hp-hr		
ELECTRIC POWER GENERATORS	CO		
Motivator	0.0068		AP-42, Fifth Edition, Table 3.3-1
Mill Auxiliary	0.0068		AP-42, Fifth Edition, Table 3.3-1
Pumpback	0.0068		AP-42, Fifth Edition, Table 3.3-1
Tailings Pumps	0.0068		AP-42, Fifth Edition, Table 3.3-1
	lb/hp-hr		

THOMPSON CREEK MINE EMISSION FACTORS

ELECTRIC POWER GENERATORS	SOx		
Motivator	0.00205		AP-42, Fifth Edition, Table 3.3-1
Mill Auxiliary	0.00205		AP-42, Fifth Edition, Table 3.3-1
Pumpback	0.00205		AP-42, Fifth Edition, Table 3.3-1
Tailings Pumps	0.00205		AP-42, Fifth Edition, Table 3.3-1
	lb/hp-hr		

THOMPSON CREEK MINE TSP EMISSIONS

SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)	TOTAL EMISSIONS (lb/hr)
SECTION 2: FUEL BURNING EQUIPMENT							
See PM10 Emissions							
SECTION 3: PROCESS AND MANUFACTURING OPERATIONS							
Primary Crusher	16,242,500 tons/year	0.5 lb/ton	4060.63	baghouse	99%	40.6063	22.25
Overland Conveyor	16,242,500 tons/year	0.12 lb/ton	974.55	baghouse	99%	9.7455	5.34
East and West Ore Feeders	14,600,000 tons/yr	0.12 lbs/ton	876	venturi	95%	43.8000	10.00
Holoflite Dryer #1	81,030 tons/year	4.93 lb/ton	199.74	venturi/ESP	99.9%	0.1997	0.05
Lube Grade Dryer Stack		0.001 lb/hr	8760	venturi/ESP	99.9%	0.0044	0.001
Holoflite Dryer #2							
Rotary Kiln							
Jet Mill Bagehouse	5,760 tons/year	0.016 lb/hr	7200	baghouse	99.0%	0.0576	0.016
Tech Fine Packaging Bin BH	5,760 tons/year	0.013 lb/hr	7200	baghouse	99.0%	0.0468	0.013
Pancake Mill Feed Bin BH	1,450 tons/year	0.001 lb/hr	3412	baghouse	99.0%	0.0017	0.001
Super Fine Packaging Bin BH	1,450 tons/year	0.024 lb/hr	8760	baghouse	99.0%	0.1051	0.024
Pebble Lime Baghouse	5,000 tons/year	2.2 lb/ton	5.50	baghouse	99.0%	0.0550	0.26
TOTAL POINT SOURCE TSP						94.6221	
						Tons/year	

THOMPSON CREEK MINE PM10 EMISSIONS

SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)	TOTAL EMISSIONS (lb/hr)
SECTION 2: FUEL BURNING EQUIPMENT							
Waste Oil Heaters							
Truck Shop 1	10,000	31.15	3.6	2800	0.0%	0.1558	0.11214
Truck Shop 2	10,000	31.15	3.6	2800	0.0%	0.1558	0.11214
Wash Bay 1	10,000	31.15	3.6	2800	0.0%	0.1558	0.11214
Wash Bay 2	10,000	31.15	3.6	2800	0.0%	0.1558	0.11214
	gal/year	lb/1000 gal	gal/hr	hr/yr			
Boilers							
Boiler #1	289,080	2.3	33	8760	0.0%	0.3324	0.0759
Hot Oil Boiler	118,260	2.3	13.5	8760	0.0%	0.1360	0.03105
	gal/year	lbs/1000 gals	gal/hr	hr/yr			
LPG Heating	25,000	0.1	0.00125		0.0%	0.0013	
	gal/year	lb/1000 gal					
ELECTRIC POWER GENERATORS							
Motivator	3,000	0.0022	1490			4.9170	3.278
Mill Auxiliary	500	0.0022	265			0.1458	0.583
Pumpback	500	0.0022	450			0.2475	0.99
Tailings Pumps	500	0.0022	1272			0.6996	2.7984
	hr/yr	lb/hp-hr	hp				
SECTION 3: PROCESS AND MANUFACTURING OPERATIONS							
Primary Crusher	16,242,500	0.05	406.0625	baghouse	99%	4.0606	2.23
	tons/year	lb/ton					
Overland Conveyor	16,242,500	0.06	487.275	baghouse	99%	4.8728	2.67
	tons/year	lb/ton					
East and West Ore Feeders	14,600,000	0.06	438	venturi	95%	21.9000	5.00
	tons/yr	lbs/ton					

THOMPSON CREEK MINE PM10 EMISSIONS

Holoflite Dryer #1	81,030	1.97	79.81455	venturi/ESP	99.9%	0.0798	0.02
	tons/year	lb/ton					
Lube Grade Dryer Stack		0.001	8760	venturi/ESP	99.9%	0.0044	0.001
Holoflite Dryer #2		lb/hr	hr/yr				
Rotary Kiln							
Jet Mill Baghouse	5,760	0.016	7200	baghouse	99.0%	0.0576	0.016
Tech Fine Packaging Bin BH	5,760	0.013	7200	baghouse	99.0%	0.0468	0.013
	tons/year	lb/hr	hr/yr				
Pancake Feed Bin BH	1,450	0.001	3412	baghouse	99.0%	0.0017	0.001
Super Fine Packaging Bin BH	1,450	0.024	8760	baghouse	99.0%	0.1051	0.024
	tons/year	lb/hr	hr/yr				
Pebble Lime Baghouse	5,000	0.88	2.20	baghouse	99.0%	0.0220	0.1056
	tons/year	lb/ton					
TOTAL POINT SOURCE PM10						38.2533	
						Tons/year	

**THOMPSON CREEK MINE
VOC EMISSIONS**

SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)
Mobile Sources						
Haul Trucks	66000	0.192	6.336		0.0%	6.3360
Dozers	9000	0.121	0.5445		0.0%	0.5445
Wheeled Loaders	9000	0.25	1.125		0.0%	1.1250
Motor Graders	9000	0.04	0.18		0.0%	0.1800
Wheeled Dozers	9000	0.192	0.864		0.0%	0.8640
Misc.	2000	0.152	0.152		0.0%	0.1520
	hours/year	lb/hour				
Evaporative Loss						
Gasoline						
Filling - submerged	75000	7.3	0.27375		0.0%	0.2738
Breaking	75000	1	0.0375		0.0%	0.0375
Fueling	75000	11	0.4125		0.0%	0.4125
Spillage	75000	0.7	0.02625		0.0%	0.0263
Desiel	gal/year	lb/1000 gal				0.0000
Loading - submerged	693000	0.014	0.004851		0.0%	0.0049
	gal/year	lb/1000 gal				
TOTAL VOC						9.9564
						Tons/year

**THOMPSON CREEK MINE
CO EMISSIONS**

SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)	TOTAL EMISSIONS (lb/hr)
FUGITIVE							
Mobile Sources							
Haul Trucks	66000	1.794	59.202		0.0%	59.2020	1.794
Dozers	9000	0.346	1.557		0.0%	1.5570	0.346
Wheeled Loaders	9000	0.572	2.574		0.0%	2.5740	0.572
Motor Graders	9000	0.151	0.6795		0.0%	0.6795	0.151
Wheeled Dozers	9000	1.794	8.073		0.0%	8.0730	1.794
Misc.	2000	0.675	0.675		0.0%	0.6750	0.675
	hours/year	lb/hour				72.7605	
POINT SOURCE							
Waste Oil Heaters	40000	5	0.1	14.4	0.0%	0.1000	0.072
	gal/year	lb/1000 gal		gal/hr			
Boilers							
Boiler #1	289080	5	0.7227		0.0%	0.7227	0.165
Hot Oil Boiler	118260	5	0.29565		0.0%	0.2957	0.0675
	gal/year	lb/1000 gal					
LPG Heating	25000	1.8	0.0225		0.0%	0.0225	
	gal/year	lb/1000 gal					
ELECTRIC POWER GENERATORS							
Motivator	3000	0.0068	1490			15.20	10.132
Mill Auxiliary	500	0.0068	265			0.45	1.802
Pumpback	500	0.0068	450			0.77	3.06
Tailings Pumps	500	0.0068	1272			2.16	8.6496
	hr/yr	lb/hp-hr	hp				
TOTAL POINT SOURCE						19.7168	
TOTAL FUGITIVE						72.7605	
TOTAL CO						92.4773	
						Tons/year	

**THOMPSON CREEK MINE
NOx EMISSIONS**

SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)	TOTAL EMISSIONS (lb/hr)
FUGITIVE							
Mobile Sources							
Haul Trucks	66000	4.116	135.828		0.0%	135.8280	4.116
Dozers	9000	1.26	5.67		0.0%	5.6700	1.26
Wheeled Loaders	9000	1.89	8.505		0.0%	8.5050	1.89
Motor Graders	9000	0.713	3.2085		0.0%	3.2085	0.713
Wheeled Dozers	9000	4.116	18.522		0.0%	18.5220	4.116
Misc.	2000	1.691	1.691		0.0%	1.6910	1.691
	hours/year	lb/hour					
Blasting	200	17				1.70	
	blasts/year	lb/blast				175.12	
						ton/yr	
POINT SOURCE							
Waste Oil Heaters	40000	55	1.1	14.4	0.0%	1.1000	0.792
	gal/year	lb/1000 gal		gal/hr			
Boilers							
Boiler #1	289080	20	2.8908		0.0%	2.8908	0.66
Hot Oil Boiler	118260	20	1.1826		0.0%	1.1826	0.27
	gal/year	lb/1000 gal					
LPG Heating	25000	0.014	0.000175		0.0%	0.0002	
	gal/year	lb/1000 gal					
ELECTRIC POWER GENERATORS							
Motivator	3000	0.031	1490			69.29	46.19
Mill Auxiliary	500	0.031	265			2.05	8.215
Pumpback	500	0.031	450			3.49	13.95
Tailings Pumps	500	0.031	1272			9.86	39.432
	hr/yr	lb/hp-hr	hp				
TOTAL POINT SOURCE						89.86	
TOATAL FUGITVE						175.12	
TOTAL NOx						264.98	
						Tons/year	

**THOMPSON CREEK MINE
SOx EMISSIONS**

SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)	TOTAL EMISSIONS (lb/hr)
FUGITIVE							
Mobile Sources							
Haul Trucks	66000	0.454	14.982		0.0%	14.9820	0.454
Dozers	9000	0.137	0.6165		0.0%	0.6165	0.137
Wheeled Loaders	9000	0.182	0.819		0.0%	0.8190	0.182
Motor Graders	9000	0.086	0.387		0.0%	0.3870	0.086
Wheeled Dozers	9000	0.348	1.566		0.0%	1.5660	0.348
Misc.	2000	0.143	0.143		0.0%	0.1430	0.143
	hours/year	lb/hour			TOTAL	18.51	
POINT SOURCES							
Waste Oil Heaters	40000	73	1.46	14.4	0.0%	1.4600	1.0512
	gal/year	lb/1000 gal		gal/hr			
Boilers							
Boiler #1	289080	71	10.26234		0.0%	10.2623	2.343
Hot Oil Boiler	118260	71	4.19823		0.0%	4.1982	0.9585
	gal/year	lb/1000 gal					
LPG Heating	25000	0.0144	0.00018		0.0%	0.0002	
	gal/year	lb/1000 gal					
ELECTRIC POWER GENERATORS							
Motivator	3000	0.00205	1490			4.58	3.0545
Mill Auxiliary	500	0.00205	265			0.14	0.54325
Pumpback	500	0.00205	450			0.23	0.9225
Tailings Pumps	500	0.00205	1272			0.65	2.6076
	hr/yr	lb/hp-hr	hp				
					TOTAL	21.52	
TOTAL FUGITIVE						18.5135	
TOTAL POINT SOURCE						21.5208	
TOTAL SOx						40.0343	
						Tons/year	

**THOMPSON CREEK MINE
HCI EMISSIONS**

SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)	TOTAL EMISSIONS (lb/hr)
Leach Plant	8,760	0.003		Scrubber	99.0%	0.01314	0.003
	hr/yr	lb/hr					

THOMPSON CREEK MINE FUGITIVE EMISSION FACTORS

SECTION 8: FUGITIVE EMISSIONS			
EMISSION FACTORS	TSP	PM10	
Drilling	1.3	0.0035	Compilation of Air Pollutant Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 8.24, Western Surface Coal Mining, Updated Sept. 1988, Table - 8.24-4, Page 8.24-8.
	lb/hole	lb/hole	
Blasting	58.5	23.4	Fugitive Dust Control Technology, General Fugitive Dust Emission Sources, Table 2.2.4-4, Page 54.
	lb/blast	lb/blast	
Overburden Removal			Fugitive Dust Emissions Factors for the Mining Industry, July 1983, American Mining Congress, Page 49.
25 yard shovel	0.0007	0.0007	
15 yard shovel	0.0004	0.0004	
loader	0.0004	0.0004	
	lb/ton	lb/ton	
Ore Mining			Fugitive Dust Emissions Factors for the Mining Industry, July 1983, American Mining Congress, Page 49.
25 yard shovel	0.0007	0.0007	
15 yard shovel	0.0004	0.0004	
loader	0.0004	0.0004	
	lb/ton	lb/ton	
Overburden Dumping	0.0032	0.0015	Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 13.2.4 Aggregate Handling and Storage Piles, Equation 1.
	lb/ton	lb/ton	
Hauling/Access Road			
haul trucks	25.5	11.54	Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 11.2 Unpaved Roads, updated Sept. 1988, Page 11.2.1-1
small vehicles	0.39	0.19	
	lb/VMT	lb/VMT	

THOMPSON CREEK MINE FUGITIVE EMISSION FACTORS

Grading			Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 8.24, Western Surface Coal Mining, Updated Sept. 1988, Table 8.24-2, Page 8.24-5.	
	19.5	9.98		
	lb/VMT	lb/VMT		
Bulldozing				
	8.65	4.32	Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 8.24, Western Surface Coal Mining, Updated Sept. 1988, Table 8.24-2, Page 8.24-5.	
	lb/hour	lb/hour		
Wind Erosion			Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 11.2.7, Industrial Wind Erosion Updated sept. 1988, Page 11.2.7-4.	
Total exposed acreage 1260 acres	0.38	0.19		
	lb/acre	lb/acre		
MOBIL EQUIPMENT COMBUSTION				
Mobil Equipment Combustion			Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section II-7, Heavy Duty Construction Equipment, Table II-7.1, Page II-7-4&5.	
Haul Trucks	0	0.256		
Dozers	0	0.112		
Wheeled Loaders	0	0.172		
Motor Graders	0	0.061		
Wheeled Dozers	0	0.165		
Misc.	0	0.139		
	lb/hour	lb/hour		
Ore drop to Mill Stockpile (low moisture ore)	0.0032	0.0015	Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 13.2.4 Aggregate Handling and Storage Piles, Equation 1.	
	lb/ton	lb/ton		

THOMPSON CREEK MINE FUGITIVE EMISSION FACTORS

Truck dumping into Crusher	0.0032	0.0015	Compilation of Air Pollutants Emission Factors, Vol. 1, Stationary Point and Area Sources, Fourth Edition, Sept. 1985, Section 13.2.4 Aggregate Handling and Storage Piles, Equation 1.	
	lb/ton	lb/ton		
Portable Crusher				
Truck unloading	0.0001	0.0001	AP 42 Volume 1, Fifth Edition, Table 11.19.2-2	
Screening	0.025	0.0087	AP 42 Volume 1, Fifth Edition, Table 11.19.2-2	
Primary Crushing	0.5	0.05	AP 42 Volume 1, Fifth Edition, Table 11.24.2	
Screening	0.025	0.0087	AP 42 Volume 1, Fifth Edition, Table 11.19.2-2	
Conveying	0.003	0.0011	AP 42 Volume 1, Fifth Edition, Table 11.19.2-2	
Secondary Crushing	0.5	0.05	AP 42 Volume 1, Fifth Edition, Table 11.24.2	
Conveying	0.003	0.0011	AP 42 Volume 1, Fifth Edition, Table 11.19.2-2	
Drop process	0.003	0.0011	AP 42 Volume 1, Fifth Edition, Table 11.19.2-2	
	lbs/ton	lbs/ton		
			Note:	
			Equation 1 - $E = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$	
			E (PM) =	0.00322479
			E (PM ₁₀) =	0.00152524
			k _{PM} =	0.74
			k _{PM10} =	0.35
			M =	2.525
			U =	8.15

**THOMPSON CREEK MINE
PM
FUGITIVE EMISSIONS**

SECTION 8: FUGITIVE EMISSIONS						
FUGITIVE SOURCES	PROCESS RATE					
Drilling	7,750					
	holes/year					
Blasting	200					
	blasts/year					
Overburden Removal						
25 yard shovel	9,475,000					
15 yard shovel	4,667,300					
loader	6,500,000					
	tons/year					
Ore Mining						
25 yard shovel	7,475,000					
15 yard shovel	0					
loader	0					
	tons/year					
Overburden Dumping	28,117,300					
	tons/year					
Hauling/Access Road						
haul trucks	386,167					
small vehicles	210,000					
	VMT					
Grading						
	8,200					
	VMT					
Bulldozing						
	4,400					
	hours					

**THOMPSON CREEK MINE
PM
FUGITIVE EMISSIONS**

Wind Erosion						
Exposed acres	1,260					
	acres					
FUGITIVE EMISSIONS TSP						
SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)
Drilling	7,750	1.3000	5.0375	cyclone	99%	0.05
	holes/year	lb/hole				
Blasting	200	58.5000	5.85		0%	5.85
	blasts/year	lb/blast				
Overburden Removal						
25 yard shovel	9,475,000	0.0007	3.31625		0%	3.32
15 yard shovel	4,667,300	0.0004	0.93346		0%	0.93
loader	6,500,000	0.0004	1.3		0%	1.30
	tons/year	lb/ton				
Ore Mining						
25 yard shovel	7,475,000	0.0007	2.61625		0%	2.62
15 yard shovel		0.0004	0		0%	0.00
loader		0.0004	0		0%	0.00
	tons/year	lb/ton				
Overburden Dumping	28,117,300	0.0032	44.98768		0%	44.99
	tons/year	lb/ton				
Hauling/Access Road						
haul trucks	386,167	25.5000	4923.62925	water	75%	1230.91
small vehicles	210,000	0.3900	40.95	water	75%	10.24
	VMT	lb/VMT				
Grading						
	8,200	19.5000	79.95		0%	79.95
	VMT	lb/VMT				

**THOMPSON CREEK MINE
PM
FUGITIVE EMISSIONS**

Bulldozing						
	4,400	8.6500	19.03		0%	19.03
	hours	lb/hour				
Wind Erosion						
	1,260	0.3800	0.2394		0%	0.24
	acres	lb/acre				
MOBIL EQUIPMENT COMBUSTION						
Haul Trucks	66,000	0.0000	0		0.0%	0.00
Dozers	9,000	0.0000	0		0.0%	0.00
Wheeled Loaders	9,000	0.0000	0		0.0%	0.00
Motor Graders	9,000	0.0000	0		0.0%	0.00
Wheeled Dozers	9,000	0.0000	0		0.0%	0.00
Misc.	2,000	0.0000	0		0.0%	0.00
	hours/year	lb/hour				
Ore drop to Mill Stockpile	16,242,500	0.0032	26		0%	25.99
	tons/year	lb/ton	tons/year			
Truck dumping into Crusher	16,242,500	0.0032	26	water	90%	2.60
	tons/year	lb/ton	tons/year			
Portable Crusher						
Truck unloading	700,000	0.0001	0.04		0%	0.04
Screening	700,000	0.0250	8.75		0%	8.75
Primary Crushing	700,000	0.5000	175.00	water	90%	17.50
Screening	700,000	0.0250	8.75		0%	8.75
Conveying	700,000	0.0030	1.05	water	90%	0.11
Secondary Crushing	700,000	0.5000	175.00		0%	175.00
Conveying	700,000	0.0030	1.05		0%	1.05
Drop process	700,000	0.0030	1.05		0%	1.05
	tons/year	lbs/ton				
TOTALTSP FUGITIVE						1640.25
						Tons/year

**THOMPSON CREEK MINE
PM
FUGITIVE EMISSIONS**

FUGITIVE EMISSIONS PM10						
SOURCE	PROCESS RATE	EMISSION FACTOR	UNCONTROLLED EMISSIONS (TONS/YEAR)	CONTROL SYSTEM	CONTROL EFFICIENCY	TOTAL EMISSIONS (TONS/YEAR)
Drilling	7,750	0.0035	0.0135625	cyclone	99%	0.00
	holes/year	lb/hole				
Blasting	200	23.4000	2.34		0%	2.34
	blasts/year	lb/blast				
Overburden Removal						
25 yard shovel	9,475,000	0.0007	3.31625		0%	3.32
15 yard shovel	4,667,300	0.0004	0.93346		0%	0.93
loader	6,500,000	0.0004	1.3		0%	1.30
	tons/year	lb/ton				
Ore Mining						
25 yard shovel	7,475,000	0.0007	2.61625		0%	2.62
15 yard shovel	0	0.0004	0		0%	0.00
loader	0	0.0004	0		0%	0.00
	tons/year	lb/ton				
Overburden Dumping	28,117,300	0.0015	21.087975		0%	21.09
	tons/year	lb/ton				
Hauling/Access Road						
haul trucks	780,000	11.5400	4500.6	water	75%	1125.15
small vehicles	210,000	0.1900	19.95	water	75%	4.99
	VMT	lb/VMT				
Grading						
	16,400	9.9800	81.836		0%	81.84
	VMT	lb/VMT				
Bulldozing						
	4,400	4.3200	9.504		0%	9.50

**THOMPSON CREEK MINE
PM
FUGITIVE EMISSIONS**

	hours	lb/hour				
Wind Erosion						
	1,260	0.1900	0.1197		0%	0.12
	acres	lb/acre				
MOBIL EQUIPMENT COMBUSTION						
Haul Trucks	66,000	0.2560	8.448		0.0%	8.45
Dozers	9,000	0.1120	0.504		0.0%	0.50
Wheeled Loaders	9,000	0.1720	0.774		0.0%	0.77
Motor Graders	9,000	0.0610	0.2745		0.0%	0.27
Wheeled Dozers	9,000	0.1650	0.7425		0.0%	0.74
Misc.	2,000	0.1390	0.139		0.0%	0.14
	hours/year	lb/hour				
Ore drop to Mill Stockpile	16,242,500	0.0015	12		0%	12.18
	tons/year	lb/ton	tons/year			
Truck dumping into Crusher	16,242,500	0.0015	12	water	90%	1.22
	tons/year	lb/ton	tons/year			
Portable Crusher						
Truck unloading	700,000	0.0001	0.04		0%	0.04
Screening	700,000	0.0087	3.05		0%	3.05
Primary Crushing	700,000	0.0500	17.50	water	90%	1.75
Screening	700,000	0.0087	3.05		0%	3.05
Conveying	700,000	0.0011	0.39	water	90%	0.04
Secondary Crushing	700,000	0.0500	17.50		0%	17.50
Conveying	700,000	0.0011	0.39		0%	0.39
Drop process	700,000	0.0011	0.39		0%	0.39
	tons/year	lbs/ton				
TOTALPM10 FUGITIVE						1303.66
						Tons/year



August 15, 2007

Dan Pitman
Air Quality Permitting
Division of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

Re: Air Quality Tier II Operating Permit No. T2-050508 - Comments

Dear Mr. Pitman,

In response to your July 23, 2007 e-mail, and your subsequent agreement to provide us additional time to respond, the Thompson Creek Mining Company (TCMC) is submitting the following comments for your consideration on the above Tier II operating permit.

Comment #1:

Section 8.1, Process Description should be revised as follows:

Pebble lime is delivered to the facility and pneumatically conveyed to the lime silo. Emissions from this transfer point are controlled by a baghouse (Pebble Lime Baghouse). The pebble lime is mixed with water to form slurry and fed into the SAG mill, neutralization tank, or the tailings line.

Please note that pebble lime is not used to process the ore to HPM. Section 3.8 of the permit application, titled "Reagents," describes how the lime is used. The pebble lime delivery should not be considered part of the HPM Milling & Packaging as lime is not used to convert concentrate grade to HPM grade, nor is lime used in milling or packaging HPM.

Comment #2:

The emission control description in Section 5 of the permit, titled "East and West Ore Feeders," mistakenly lists a venturi scrubber and an emission limit related to one stack to serve both the East and West Ore Feeders. Section 3.3 in the permit application, titled "Crushing and Grinding" states as follows: *"Emissions from each ore feeder are controlled with individual wet venturi scrubbers and vented to the atmosphere through corresponding stacks."* Also, Appendix C in the application, titled "Application Form/Emissions Inventory, Source General Information" indicates that there are "2" wet venturi scrubbers, while "Appendix C Application Form/Emissions Inventory, Stack Information" identifies a separate stack for each ore feeder. In summary, the East Ore Feeder has a venturi scrubber with a corresponding stack and the West Ore Feeder has a venturi scrubber with a corresponding stack (i.e., there are two scrubbers and two stacks).

If you have any questions regarding these comments, please contact Bert Doughty or myself at (208)838-2200.

Sincerely,

Eric Tilman
Environmental Engineer,
Thompson Creek Mine



August 15, 2007

Dan Pitman
Air Quality Permitting
Division of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

Re: Air Quality Tier II Operating Permit No. T2-050508 - Comments

Dear Mr. Pitman,

In response to your July 23, 2007 e-mail, and your subsequent agreement to provide us additional time to respond, the Thompson Creek Mining Company (TCMC) is submitting the following comments for your consideration on the above Tier II operating permit.

Comment #1:

Section 8.1, Process Description should be revised as follows:

Pebble lime is delivered to the facility and pneumatically conveyed to the lime silo. Emissions from this transfer point are controlled by a baghouse (Pebble Lime Baghouse). The pebble lime is mixed with water to form slurry and fed into the SAG mill, neutralization tank, or the tailings line.

Please note that pebble lime is not used to process the ore to HPM. Section 3.8 of the permit application, titled "Reagents," describes how the lime is used. The pebble lime delivery should not be considered part of the HPM Milling & Packaging as lime is not used to convert concentrate grade to HPM grade, nor is lime used in milling or packaging HPM.

Comment #2:

The emission control description in Section 5 of the permit, titled "East and West Ore Feeders," mistakenly lists a venturi scrubber and an emission limit related to one stack to serve both the East and West Ore Feeders. Section 3.3 in the permit application, titled "Crushing and Grinding" states as follows: *"Emissions from each ore feeder are controlled with individual wet venturi scrubbers and vented to the atmosphere through corresponding stacks."* Also, Appendix C in the application, titled "Application Form/Emissions Inventory, Source General Information" indicates that there are "2" wet venturi scrubbers, while "Appendix C Application Form/Emissions Inventory, Stack Information" identifies a separate stack for each ore feeder. In summary, the East Ore Feeder has a venturi scrubber with a corresponding stack and the West Ore Feeder has a venturi

August 15, 2007

August 15, 2007

If you have any questions regarding these comments, please contact Bert Doughty or myself at (208)838-2200.

Sincerely,

A handwritten signature in cursive script that reads "Eric R. Tilman". The signature is written in black ink and has a fluid, connected style.

Eric Tilman
Environmental Engineer,
Thompson Creek Mine